

Presented to the Court by the foreman of the
Grand Jury in open Court, in the presence of
the Grand Jury and FILED in The U.S.
DISTRICT COURT at Seattle, Washington.

SEPTEMBER 26 2007
BRUCE RIFKIN, Clerk
By [Signature] Deputy

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

UNITED STATES OF AMERICA,
Plaintiff,

v.

MANDEEP RANGA,
Defendant.

CR07 0327 RSM

INDICTMENT



07-CR-00327-INDI

The Grand Jury charges that:

Count One

(Conspiracy to Import MDMA (Ecstasy))

Beginning at a time unknown, but within the past five years, and continuing until
on or about March 10, 2007, in Whatcom and King Counties, within the Western
District of Washington, and elsewhere, MANDEEP RANGA, and others known and
unknown, knowingly and intentionally conspired to import into the United States, that
is, the Western District of Washington, from a place outside the United States, that is,
British Columbia, Canada, 3,4-methylenedioxymethamphetamine, known as MDMA
(Ecstasy), a substance controlled under Schedule I, Title 21, United States Code,
Section 812.

All in violation of Title 21, United States Code, Sections 952(a), 960(a)(1),
960(b)(3), and 963.

Count Two

(Importation of MDMA (Ecstasy))

At an exact time unknown, but approximately February 2007, in the Western District of Washington, MANDEEP RANGA, and others known and unknown, knowingly and intentionally imported into the United States from a place outside the United States, that is, British Columbia, Canada, and aided and abetted the importation of, 3,4-methylenedioxymethamphetamine, known as MDMA (Ecstasy), a substance controlled under Schedule I, Title 21, United States Code, Section 812.

The Grand Jury further alleges that this offense was committed during and in furtherance of the conspiracy charged in Count One.

All in violation of Title 21, United States Code, Sections 952(a), 960(a)(1), and 960(b)(3), and Title 18, United States Code, Section 2.

Count Three

(Conspiracy to Engage in Money Laundering)

Beginning at a time unknown but within the last five years, and continuing until on or about March 10, 2007, within the Western District of Washington, and elsewhere, MANDEEP RANGA, and others known and unknown, knowingly and intentionally did conspire to transport United States currency from a place inside the United States, that is, the Western District of Washington, to or through a place outside the United States, that is British Columbia, Canada, with the intent to promote the carrying on of a specified unlawful activity, that is, conspiracy to import 3,4-methylenedioxymethamphetamine, known as MDMA (Ecstasy), in violation of Title 21, United States Code, Sections 952(a), 960(a)(1), 960(b)(3), and 963.

It is further alleged that this offense was committed during and in furtherance of the conspiracy charged in Count One above.


1 All in violation of Title 18, United States Code, Sections 1956(a)(2)(A) and
2 1956(h).


3 A TRUE BILL

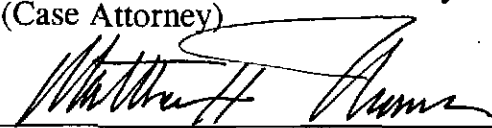
4 DATED: 9/26/2007

5
6 *(Signature of Foreperson redacted pursuant to the
policy of the judicial conference.)*

7
8 FOREPERSON

9
10 
11 JEFFREY C. SULLIVAN
12 United States Attorney

13 
14 DOUGLAS B. WHALLEY
15 Assistant United States Attorney
16 (Case Attorney)

17 
18 MATTHEW THOMAS
19 Assistant United States Attorney
20 (Case Attorney)